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STATE OF COLORADO

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COLORADO DEPARTMENT OF HEALTH
Dedicated to protecting and improving the health and
environment of the people of Colorado

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Roy Romer
Governor

Patricia A. Nolan, MD, M
Executive Director

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EC&G
ROCKY FLATS PLANT
CORRESPONDENCE COLLEGE

October 13, 1993

Mr. Richard J. Schassburger
U.S. Department of Energy
Rocky Flats Office, Building 116
P.O. Box 928
Golden, Colorado 80402-0928

RE: Process Improvement Proposals for OUs 7 and 11

Dear Mr. Schassburger,

On September 3rd, 1993, DOE, EPA, and CDH staff met to discuss the above referenced subject. This letter serves to document CDH and EPA concurrence with the spirit of the proposal. The agencies' understanding of the proposed process is outlined below. Details of how data should be evaluated, risks calculated, and protectiveness demonstrated remain to be worked out by technical staff. Our common goal is to keep the cleanup effort for these areas moving forward as efficiently as possible while maintaining compliance with applicable regulatory statutes.

OU7

The current Phase I RFI/RI data (source/soils) will need to be scrutinized and, where necessary, supplemented with additional field activities to assess ground and surface water conditions in and around the landfill. This additional work will be detailed through either a technical memorandum that modifies the current Workplan or incorporating the additional work requirements into the IM/IRA Decision Document, as appropriate. The format of the Phase I RFI/RI report will be subject to negotiation, and the data from this full pathways effort will be presented in a form yet to be agreed upon. Performance of this additional characterization work under the Phase I program is intended to eliminate the need for a Phase II investigation.

The actions evaluated in the IM/IRA Decision Document for the present landfill can be limited to the presumptive remedy alternatives for landfills. This will satisfy the CHWA closure requirements and be consistent with EPA guidance. Because the remedy can be presumptive, the Decision Document scope can be limited, allowing preparation of the document concurrent with supplementary field work.

The landfill pond must also undergo closure concurrent with the landfill itself. The agencies believe that simultaneous closure of the landfill and the landfill pond would be appealing from an engineering and economic perspective. In order to select a course of action for the landfill pond, a preliminary evaluation of risk for the water, sediments, and adjacent soils (including spray evaporation areas) should be performed. If the pond represents an unacceptable risk, joint closure action would be warranted.

Before a Corrective Action Decision/Record of Decision can be executed, a final Baseline Risk Assessment and a comprehensive evaluation of the protectiveness of the interim actions must be completed. This will examine the landfill, pond, and associated areas, and be used in conjunction with CHWA requirements to determine what subsequent actions or additional post-closure care will be required. Such a decision will be formalized in the CAD/ROD.

RRES CONTROL	x	x
FSY1300		
MIN RECORD 080	x	

viewed for Addressee
Corres. Control RFP

22-93
DATE BY

Ltr

ORDER # 5400-1

ADMIN RECORDS

DOCUMENT CLASSIFICATION
REVIEW WAVE PER
CLASSIFICATION OFFICE

The agencies will not allow potential delays in the opening of the new landfill to adversely impact the closure of the existing landfill.

OU11

The agencies support the integration of field work into a comprehensive single-phase investigation addressing a full pathways analysis and incorporating appropriate risk analysis. This may be accomplished by modifying the existing IAG-specified approach through issuance of technical memoranda and/or an IM/IRA Decision Document as described for OU7. Either approach will serve to focus the investigation, may employ "if/then" alternatives in the process, and specify the use of early actions to mitigate any risks. If no contamination requiring a response is identified, or interim actions adequately address all contamination, a No Further Action decision will be ultimately documented in the CAD/ROD.

General

Several administrative mechanisms and alternative procedures are possible to achieve the stated goals for both OUs. The agencies are flexible with respect to how the goals are reached. Based on the above guidance, the agencies request that DOE present a specific proposal for the preferred approach. It will then be DOE's obligation to direct and manage the agreed-upon procedure.

While the agencies recognize that scope changes are acceptable justification for future IAG milestone impacts, delays caused by past funding and/or prioritization inadequacies remain the responsibility of DOE.

If you agree with the process as outlined here, you may proceed accordingly with preparation of the appropriate documents for submittal and agency review. If you have any questions regarding these matters, please call Dave Norbury (OU7) at 692-3415 or Joe Schieffelin (OU11) at 692-3356 to schedule further discussions.

Sincerely,



Gary W. Baughman, Chief
Facilities Section
Hazardous Waste Control Program

cc: Martin Hestmark, EPA
Bob Birk, DOE
~~Tim O'Rourke~~, EG&G
Laura Perrault, AGO
Jackie Berardini, CDH-OE